

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOMINIC GWINN,)	
)	
Plaintiff,)	Case No. 23-cv-1823
)	
v.)	Hon. Jeremy C. Daniel
)	
CITY OF CHICAGO <i>et al.</i> ,)	
)	
Defendants.)	

**JOINT MOTION FOR EXTENSION OF TIME
TO SUBMIT PROPOSED JURY INSTRUCTIONS**

Plaintiff Dominic Gwinn and Defendants the City of Chicago and David O'Neal Brown, by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b), hereby respectfully request a seven-day extension of time to file their proposed jury instructions, from August 18, 2025 to August 25, 2025, and in support state as follows:

1. This case is proceeding to a damages-only jury trial on September 15, 2025. (Dkt. 66). The parties' final pretrial order is due on August 18, 2025, and the final pretrial conference is scheduled for August 27, 2025 at 10:00am. (*Id.*).
2. The parties are required to jointly submit proposed jury instructions as part of the final pretrial order.
3. Counsel for the parties met and conferred on August 14, 2025, and are working together in good faith to complete the joint final pretrial order. The parties are on track to file the final pretrial order by its August 18, 2025 deadline, with the sole exception of the proposed jury instructions.
4. In order to more thoroughly work through the proposed jury instructions and reach agreements, the parties respectfully seek a brief seven-day extension of time for the parties to jointly file their proposed jury instructions.

5. The parties make this request in good faith and not for purposes of delay.

6. Granting this extension will not otherwise impact the Court's scheduling in this case, as the final pretrial conference is scheduled for August 27, 2025 at 10:00am.

WHEREFORE, Plaintiff and Defendants jointly and respectfully request that the Court enter an Order extending their deadline to file their proposed jury instructions from August 18, 2025 to and including August 25, 2025. The parties still intend to file their final pretrial order with the remaining information by the current deadline of August 18, 2025.

DATED: August 14, 2025

Respectfully submitted,

DOMINIC GWINN

By: /s/ Evan A. Andersen

One of His Attorneys

Evan A. Andersen
Anthony J. Underwood
SRIPLAW, P.A.
3355 Lenox Road NE
Suite 750
Atlanta, GA 30326
470-598-0800
Fax: 561-404-4353
evan.andersen@sriplaw.com
anthony.underwood@sriplaw.com

Joel Benjamin Rothman
SRIPLAW, P.A.
21301 Powerline Road
Suite 100
Boca Raton, FL 33433
561-404-4350
Fax: 561-404-4353
joel.rothman@sriplaw.com

Yanling Jiang
JiangIP LLC
33 West Jackson Boulevard
Ste 200
60604
Chicago, IL 60604

630-733-9483
yanling@jiangip.com

Yi Bu
JiangIP LLC
33 West Jackson Boulevard
Unit #2W
Chicago, IL 60604
262.729.3628
ybu@jiangip.com

Counsel for Plaintiff Dominic Gwinn

DATED: August 14, 2025

Respectfully submitted,

**CITY OF CHICAGO and DAVID O'NEAL
BROWN**

By: /s/ Sophie E. Honeyman
One of Their Attorneys

Joseph F. Schmidt (ARDC # 2492180)
Sophie E. Honeyman (ARDC # 6343417)
TAFT STETTINIUS & HOLLISTER LLP
111 E. Wacker Dr., Ste. 2600
Chicago, Illinois 606061
(312) 527-4000
jschmidt@taftlaw.com
shoneyman@taftlaw.com

Counsel for Defendants City of Chicago and David O'Neal Brown

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